VIA ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

> Re: NCTA Filing of December 23, 2005 in CS Docket No. 97-80 Commercial Availability of Navigation

Dear Ms. Dortch:

On behalf of Hitachi Home Electronics (America), Inc., Hitachi America, Ltd. and Hitachi, Ltd., I am writing to correct certain misimpressions imparted in the above-referenced docket by the National Cable and Telecommunications Association. Specifically, Hitachi wishes to clarify the limited extent of its participation in various OpenCable activities.

Hitachi is a "participant" in CableLabs' Engineering Change Request ("ECR") process because such participation is the only means by which Hitachi can obtain timely information concerning specification changes that might affect Hitachi's Unidirectional Digital Cable Ready ("UDCR") devices and to monitor proposed changes to other OpenCable Application Platform ("OCAP") specifications.

Hitachi does not wish the Commission to view Hitachi's limited participation in the ECR process as an endorsement of: (i) the method by which OpenCable develops its specifications, (ii) the licenses offered by OpenCable, or (iii) the OCAP specifications. Rather, Hitachi's limited participation is a necessary measure to protect consumers' investments in Hitachi UDCR products and to potentially improve the OpenCable process and specifications.

Hitachi appreciates the Commission's review of this letter and can be responsive to the Commission's further questions or requests for clarification concerning this matter.

Respectfully submitted,

Kengo Ohashi Vice President, Design Engineering Hitachi Home Electronics (America),

Inc.

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